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United States of America

Attorneys for Federal Defendants.

IN THE UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CALIFORNIA COALITION FOR WOMEN
PRISONERS; R.B.; A.H.R.; S.L.; J.L.; J.M.;
G.M.; A.S.; and L.T., individuals on behalf of
themselves and all others similarly situated,

Plaintiffs

v.

UNITED STATES OF AMERICA FEDERAL
BUREAU OF PRISONS, a governmental entity;
BUREAU OF PRISONS DIRECTOR
COLETTE PETERS, in her official capacity;
FCI DUBLIN WARDEN THAHESHA JUSINO,
in her official capacity; OFFICER
BELLHOUSE, in his individual capacity;
OFFICER GACAD, in his individual capacity;
OFFICER JONES, in his individual capacity;
LIEUTENANT JONES, in her individual
capacity; OFFICER LEWIS, in his individual
capacity; OFFICER NUNLEY, in his individual
capacity; OFFICER POOL, in his individual
capacity; LIEUTENANT PUTNAM, in his
individual capacity; OFFICER SERRANO, in
his individual capacity; OFFICER SHIRLEY, in
his individual capacity; OFFICER SMITH, in his
individual capacity; and OFFICER VASQUEZ,
in her individual capacity,

Defendants.

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CASE NO. 4:23-CV-04155-YGR

**UNITED STATES' NOTICE OF INTENT TO
CALL REBUTTAL WITNESSES,
PRELIMINARY INJUNCTION
EVIDENTIARY HEARING**

- 1 1. Campos, Constance. Ms. Campos is a correctional counselor. She is expected to testify about
2 the pat search of K.D. as referenced in K.D.'s sworn testimony.
- 3 2. Dulgov, Arthur. Mr. Dulgov is FCI Dublin's interim Warden. He is expected to testify about
4 his current role and plans moving forward, confined to the scope of issues raised by
5 Plaintiffs' witnesses.¹
- 6 3. H., A. A.H. is currently incarcerated at FCI Dublin. She is expected to testify about current
7 conditions at FCI Dublin, including but not limited to the risk of sexual assault by current
8 staff and retaliation for reporting sexual assault, confined to the scope of issues raised by
9 Plaintiffs' witnesses.²

10 Dated this 7th day of January 2024.

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12 JESSE A. LASLOVICH
13 United States Attorney
14 District of Montana

15 Madison L. Mattioli
16 MADISON L. MATTIOLI
17 Assistant United States Attorney
18 District of Montana
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27 ¹ Subject to removal based on time constraints.

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